

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

JOHN DOE,)	
)	
Plaintiff,)	
v.)	Civil Action No. 6:19-CV-00023
)	
WASHINGTON AND LEE UNIVERSITY)	
)	
Defendants.)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE ANSWER, MOTION TO
DISMISS, AND OPPOSITION TO MOTION TO DISMISS**

Defendant Washington & Lee University (“W&L”) respectfully requests a three-week extension on its deadline to file an Answer and Motion to Dismiss in response to Plaintiff John Doe’s (“Doe”) Complaint (Doc. 1). Plaintiff John Doe, in turn, requests a one-week extension on its deadline to respond to W&L’s Motion to Dismiss. This motion more completely covers the same issues addressed in Plaintiff’s Unopposed Motion for Extension of Time filed on June 18, 2019 (Doc. 7). In support of these requests, the parties aver as follows:

1. Doe filed a Complaint against W&L on April 23, 2019.
2. Pursuant to W&L’s acceptance of Doe’s Waiver of Service of Summons, W&L must file its responsive pleadings on June 24, 2019.
3. In addition to answering Doe’s Complaint, W&L intends to file a Rule 12(b)(6) Motion to Dismiss some of Doe’s claims.

4. Doe's General Counsel is necessary to W&L's completion of its Answer and Rule 12(b)(6) motion but has been and continues to be with her mother in hospice care outside of Virginia.

5. Therefore, W&L requests a three-week extension, until July 8, 2019, to allow its General Counsel to handle her family issues while contributing as necessary to W&L's completion of its responsive pleadings.

6. This Court's standard pretrial order allows parties 14 days to respond to motions.

7. In light of the extension W&L requests for its responsive pleading, the parties jointly request that the Court grant Doe an additional seven days (or 21 days total), to July 29, 2019, to respond to W&L's Motion to Dismiss.

WHEREFORE, the parties respectfully request that the Court enter the accompanying order approving the parties' extension requests.

Dated: June 19, 2019

Respectfully submitted,

WASHINGTON & LEE UNIVERSITY

By: /s/

R. Craig Wood (VSB # 24264)
MCGUIREWOODS LLP
652 Peter Jefferson Parkway, Ste. 350
P. O. Box 1288
Charlottesville, VA 22902
(Office) (434) 977-2558
(Fax) (434) 980-2274
cwood@mcguirewoods.com

Micah B. Schwartz (VSB # 77299)
MCGUIREWOODS LLP
Gateway Plaza

800 East Canal Street
Richmond, Virginia 23219
(Office) (804) 775-1000
(Fax) (804) 698-2158
mschwartz@mcguirewoods.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of June 2019, a true copy of the foregoing was filed with the Court using the CM/ECF system, which will send notification of such filing to the following:

David G. Harrison (VSB #17590)
THE HARRISON FIRM, PC
5305 Medmont Circle SW
Roanoke, VA 24018
Tel: (540) 777-7100
Fax: (540) 777-7101
david@harrisonfirm.us

Patricia M. Hamill (Pa. I.D. No. 48416)
CONRAD O'BRIEN PC
1500 Market Street, Centre Square
West Tower, Suite 3900
Philadelphia, PA 19102
Tel: (215) 864-9600
Fax: (215) 864-9620
phamill@conradobrien.com

_____/s/
R. Craig Wood (VSB # 24264)
MCGUIREWOODS LLP
652 Peter Jefferson Parkway, Ste. 350
P. O. Box 1288
Charlottesville, VA 22902
(Office) (434) 977-2558
(Fax) (434) 980-2274
cwood@mcguirewoods.com

Micah B. Schwartz (VSB # 77299)
MCGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
(Office) (804) 775-1000
(Fax) (804) 698-2158
mschwartz@mcguirewoods.com

Counsel for Defendant